

EXHIBIT A

**IN THE CIRCUIT COURT OF MONTGOMERY COUNTY, ALABAMA
CIVIL DIVISION**

SHARON LEA MANNING WAID,

Plaintiff,

Vs.

CIVIL ACTION NO. CV-05-_____

**REJEANA V. FREEMAN, an individual
BUDGET RENT A CAR, INC.
a business entity whose status will be
added by amendment when ascertained,
Defendant number 2, A business entity whose status
will be added by amendment
when ascertained Defendant Number 3 whether
singular or plural hereby intending
to designate the driver of the vehicle
who negligence/wantonness injured
the Plaintiff and Defendant Number 4, whether
singular or plural, Plaintiff hereby
intending to designate the owner
of the motor vehicle in which the Defendant
was driving at the time her
negligently/wantonness injured the
Plaintiff. (Plaintiff avers that said the identifies
of said fictitious parties Defendant are unknown
to the Plaintiff at this time but whose true
names will substituted by amendment when ascertained.)**

**PLAINTIFF'S FIRST INTERROGATORIES
TO DEFENDANTS**

The Plaintiff, **SHARON LEA MANNING WAID**, files the following discovery to the Defendants, **REJEANA V. FREEMAN, BUDGET RENT A CAR, INC.** The instructions and definitions herein shall be considered a part of each separate interrogatory and request for production of documents, and the interrogatory and request for production shall be deemed to include the information described in said instructions and definitions. The time period to be covered by each response is the time period relevant to the issue involved, unless a different time period is specified.

INSTRUCTIONS AND DEFINITIONS

If the information requested is not available to the party to whom this discovery is directed, said party is requested to state all efforts made to obtain information and from what source such information might be obtained, if known to said party.

These Interrogatories shall be deemed continuing and the party to whom they are addressed shall be obligated to change, supplement, and amend heir answer as required by the Rules of Civil Procedure.

The following definitions shall apply to this consolidated discovery including Interrogatories and request for production of documents.

A. "You", "Your", or "Defendant" refers to each of the Defendants individually, separately and several, and said questions would therefore e addressed to each of said persons by the use of said term.

B. "Document" or "Record" or words of familiar import, in the singular or plural refers to any written or graphic material which relates, concerns or pertains directly or indirectly to any and all matters involved in this litigation, including, but not limited to, correspondence, checks, memoranda, oral communications which have been reduced to writing, records, of accounts, books of accounts, worksheets, notes, diaries, summaries of writings of any kind, copies of an of the foregoing and also meaning and including any information which is stored electronically or on compute equipment, tape recorded otherwise.

C. "Persons", or "Persons" refers to all individuals or all entities, including without limitation all associations, companies, partnerships, joint ventures, corporations, trust, estates, or similar type entities.

D. "Agent" refers to any person, servant, or representative of any the Defendants separately and severally as said question is intended to apply to each of he individual Defendants separately and severally.

E. The word "identify":

(a). When used with respect to records or documents, shall mean to describe with specificity the name, date, subject matter, and present (or if present not known, the last known) whereabouts of any such records or documents.

(b). When used with respect to a person as defined herein, shall mean to provide information sufficient to notice the deposition of such person and to serve such person with the process requiring attendance at a place of examination and shall include without limitation, such persona's full name, present or last known address: the last date such address was known or believed to be correct: and where applicable, such person's present or last known business affiliation, title, or occupation, and each of his or her positions, titles, or job description during the applicable period of time covered by any answer referring to such person.

If you object to the answering of any questions in this discovery or the production of any documents based upon a claim that said answer or documents are privileged, for each question and document please supply the following information:

(A). The author of the document or information needed for the answer.

(b). The person or persons to whom the document was addressed or the information furnished.

(C.) The date of the document or the date the information was furnished which would be supplied in the answer.

(D). The basis upon which you claim said answer or document is privileged.

INTERROGATORIES

The Plaintiff propounds the following Interrogatories to the Defendant, to be answered under the rules and manner of the Alabama Rules of Civil Procedure:

1. Who answers these Interrogatories?

2. Who assists you in answering these Interrogatories?

3. State your full name, address, marital status, and social security number and phone number.

4. State your place of employment, address of your place of employment, phone number of your place of employment, supervisory at said employment, your position at said employment and salary at said employment and for how long you have been employed. State the specific nature of your business at the time of the car wreck.

5. State your ownership in the vehicle that you were driving in the car wreck that is the subject matter of this lawsuit. If were not the owner of the motor vehicle which you were driving in this matter please state the full legal name, address and phone number of the owner

6. State the name of any and all insurance companies that provide coverage for you and any and all business entities on any and all claims or judgements against you in this matter. Please give the name, address, phone number and policy number of each insurance company. Please provide a copy of each insurance company policy, including the declaration page showing the amount of the coverage for each policy.

7. State, other than your Attorney, the names, addresses and phone numbers of all individuals that you discussed the matter of the car wreck that is the subject matter of this

lawsuit. Describe in detail the subject matter of each conversation. Please give the name, address and phone number of each such person.

8. Describe in details what happened just prior to, doing and after the car wreck that is the subject matter of this lawsuit.

9. Have you ever been convicted of a traffic violation? If so, please give each and every traffic violation you have been convicted of within six years prior to August 26, 2003 to the present date with the offense convicted of, the court of said conviction and the results of said conviction?

10. Describe each and every lawsuit that you have been involved in prior to the subject lawsuit and give the details of each lawsuit, the court of each lawsuit, the names of the parties of each lawsuit, your status in each lawsuit and the result of each lawsuit.

11. Have you ever been convicted of a crime? State the date of each crime, each court of conviction and results of each conviction. Please give the case number, the name, address and phone number of each court that you appear in each case.

12. If this action is being defended under any reservation of rights, or under any other type of nonwaiver agreement, please describe said agreement in detail, including the date of said agreement, the names of all parties to said agreement, and attach to your answers to these interrogatories, a copy of said agreement.

13. If there is any reservation of rights agreement, or other type of nonwaiver agreement, please describe in detail, the provision of the insurance policy or indemnity agreement upon which said reservation of rights or nonwaiver agreement is based.

14. If there is a reservation of rights or nonwaiver type of agreement pertaining to any insurance policy or other indemnity agreement covering you in this case, please

attach to your answers to these interrogatories, a copy of any correspondence or communication between any party (other than your Attorney) that pertains to said reservation of rights or nonwaiver agreement.

15. Please give the name of all witnesses to this wreck with their addresses and phone numbers. Give the date that you talk to each witness about this car wreck and the substance of each said conversation. Give the names, addresses and phone numbers of each such witness.

16. If you are alleging that the Plaintiff was at fault at the time of the car wreck please detail specifically your reason or reasons for such allegation and defense.

REQUEST FOR PRODUCTION

The definitions referred to and contained in the above and foregoing Interrogatories are applicable to this request for production of documents. Plaintiff in the above styled action request the Defendant and to produce and permit Plaintiff or and Plaintiff's Attorneys or representative to inspect, copy, photograph, make copies of, or make transcriptions of any tapes, make duplicate copies of any photographs, photograph any items and documents referred to herein, and to inspect said documents or items hereindescribed on the 15th day of October 2005, at 10:00 A. M. at the Law Offices of Tom Payne, 305 South Lawrence Street, Montgomery, Alabama 36104.

1. Any documents or records identified or referred to in the above and foregoing Interrogatories or referred to or identified in any of your answers to any of the above and foregoing answers to interrogatories.

2. All correspondence or communications between you and any other person which pertains to any of the facts or issues or matters in dispute in this litigation, at any time prior to the date of your answering the discovery.

3. Any statements, whether written, recorded or otherwise obtained by you or any other person from any party to this action or from any witness to any of the facts and circumstances involved in or forming the basis of their action.

4. A copy of any insurance policies or agreements for indemnities providing for the defense of his action or the payment of any judgment that may be rendered in this action.

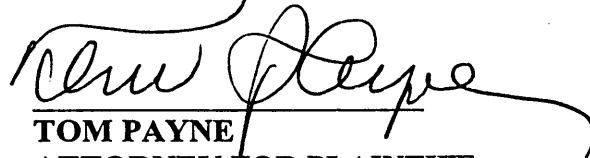
5. Copies of all photographs of the Plaintiff's motor vehicle, your motor vehicle and any other photographs taken in this matter.

6. Copies of your driving record for the last five years prior to the date of the occurrence of the car wreck which is the substance of this lawsuit.

Pursuant to the provisions of the rules of civil procedure, you are requested to make a request under the provisions of said rules, for a copy of any of the documents sought to be produced or for the items sought to be produced herein and to make said statements, documents or items available pursuant to this request for production.

DONE this the 28th day of August 2005.

RESPECTFULLY SUBMITTED



**TOM PAYNE
ATTORNEY FOR PLAINTIFF
305 SOUTH LAWRENCE STREET
MONTGOMERY, ALABAMA 36104
269-1791**

IN THE CIRCUIT COURT OF MONTGOMERY COUNTY, ALABAMA
CIVIL DIVISION

SHARON LEA MANNING WAID,

Plaintiff,

VS.

CASE NO. CV-05-_____

REJEANA V. FREEMAN, an individual and
BUDGET RENT A CAR, INC., etc. al.

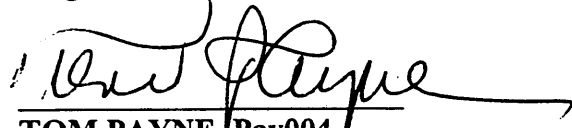
Defendants.

**PLAINTIFF'S REQUEST FOR ADMISSIONS
TO DEFENDANTS**

Plaintiff submits the following Request for Admissions to be answered by Defendant under the ARCP in the manner and time limit set out therein:

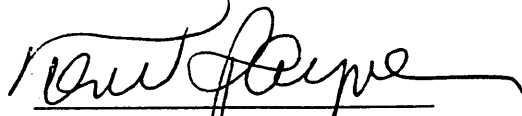
1. Admit that you drove your car wrongfully drove your into the rear of the car being driven by the Plaintiff on the date, time and place of the car wreck that is the substance of the subject lawsuit.

DONE this 24 of August 2005.


TOM PAYNE Pay004
ATTORNEY FOR PLAINTIFF
305 SOUTH LAWRENCE STREET
MONTGOMERY, ALABAMA 36104
269-1791

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing upon Defendants REJEANA V. FREEMAN AND BUDGET RENT A CAR, INC., with a copy of the lawsuit filed herein.


TOM PAYNE

TOM PAYNE
REJEANA V. FREEMAN AND BUDGET RENT A CAR, INC.

Honorable Melissa Ritternour
Clerk of the Circuit Court
Civil Division
Montgomery County Courthouse
251 South Lawrence Street
Montgomery, Alabama 36104

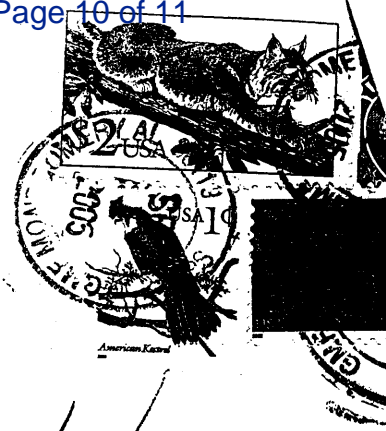
**RETURN RECEIPT
REQUESTED**

**RESTRICTED
DELIVERY**

729
7005 1160 0004 6820 0891

**RESTRICTED
DELIVERY**

Recent
Attempted Not Known Ref. Date
Insufficient Address Ms. Rejeana V. Freeman
No Such Street 1628 Mohava
Apt. Glendale, Arizona 85307
Forwarding Order Expired
Forward Left No Forward #
STF



PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Ms. REJEANA V. Freeman
1628 Mohava
Glendale, ARIZONA
85307
Melissa Ritternour
Circuit Clerk

2. Article Number
(Transfer from service label)

PS Form 3811, February 2004

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

- ☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

- D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

CV-2005-2185 DI

3. Service Type

- ☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☒ Yes

7005 1160 0004 6820 0891

102595-02-M-1540

P- ~~Rejeana Freeman~~
d- ~~Shawn Waid~~
P- Shawn Waid
d- Rejeana Freeman
Charles T Payne

KWR

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p> <p>1. Article Addressed to:</p> <p>Ms. Stacy Anderson Manager Budget Rent A Car 3785 Selma Highway Montgomery, AL 36117</p>		<p>A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>X Jeffrey Washburn</p> <p>B. Received by (Printed Name) C. Date of Delivery</p> <p>Jeffery Washburn 9-2-05</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If YES, enter delivery address below:</p> <p>CV-2005-2185 S/C D2</p>	
<p>2. Article Number (Transfer from service label) C 7005 1160 0004 6820 0884 4 PAY004</p>		<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input checked="" type="checkbox"/> Yes</p>	

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

P- Sharon Manning
d- Rejane Freeman

Judge Reese

Charles T Payne